

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 22-CR-10038-IT
)	
ARIEL LEGASSA)	

**Partially Assented-to Motion To Modify Conditions of
Release to Permit Travel to New York**

Defendant Ariel Legassa hereby moves, with the assent of Probation and Pretrial Services and the government, to expand travel restrictions to include the State of New York for purposes of transporting his children to and attending their sporting events.

Mr. Legassa also moves, without the consent of Probation and Pretrial Services and the government, to permit travel to New York for purposes of driving for Uber.

As grounds for this motion, Mr. Legassa states that he resides in Connecticut and is permitted to travel outside of that state only to the Commonwealth of Massachusetts. As a result of publicity from this case and a companion civil case, Mr. Legassa is unable to obtain a job that is commensurate with his qualifications and experience. He needs to work. The income his wife earns is insufficient to support the household, which presently includes Mr. and Mrs. Legassa and their four children.

To make ends meet, Mr. Legassa had been driving the Tesla he and his wife own for Uber. The government recently seized the Tesla and took physical possession of it. There was no need to seize the Tesla. It cannot be sold or transferred. It secures in part the release bond and the court has possession of the title.

Mr. Legassa needs to drive for Uber to provide for his family as best he can. Uber trips that originate in his home state of Connecticut frequently terminate in New York. He cannot presently take those fares.

Mr. Legassa is in full compliance with his conditions of release. He is not a danger to the community. Permitting travel to the State of New York to attend the sporting events of his children and to drive for Uber will not increase the risk that he will abandon his family and flee rather than defend this case. And the Legassa family needs the income he will earn.

For all of those reasons, the court should modify the conditions of Mr. Legassa's release to permit travel to the State of New York for the purposes stated above.

ARIEL LEGASSA

By his attorney,

/s/ E. Peter Parker

E. Peter Parker

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 30, 2022.

/s/ E. Peter Parker

E. Peter Parker